

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

RANDELL SETH ADSIT )

Case No. 5:20-MJ-588 (TWD)

Defendant. )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of November 11, 2020 in the county of Lewis in the Northern District of New York the defendant(s) violated:

*Code Section*

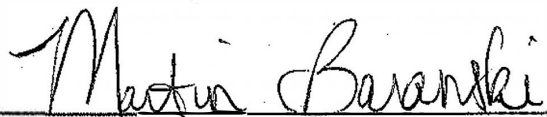
18 U.S.C. § 2252A(a)(2)(B)

*Offense Description*

Knowingly receiving and distributing any material that contains child pornography using any means or facility of interstate or foreign commerce or that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:  
See Attached Affidavit

☒ Continued on the attached sheet.



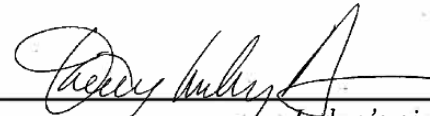
Complainant's signature

Martin Baranski, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: November 11, 2020



Judge's signature

City and State: Syracuse, NY

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, MARTIN BARANSKI, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent employed by the United States Department of Justice, Federal Bureau of Investigation (FBI), and as such I am an "investigative or law enforcement officer" of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Chapter 63. I have been a Special Agent with the FBI since October of 2018. I am currently assigned to the FBI's Albany Division where I investigate all federal criminal violations. I have participated in investigations of persons suspected of violating federal child pornography laws, including Title 18, United States Code, Sections 2252 and 2252A. I have received training in the area of child sexual exploitation and have had the opportunity to observe and review examples of child pornography in all forms of media including computer media.

2. This affidavit is offered in support of a criminal complaint and arrest warrant charging Randell Seth Adsit with violating 18 U.S.C. § 2252A(a)(2)(B) (receipt and distribution of material containing child pornography).

3. The statements in this affidavit are based upon my investigation, information provided to me by other law enforcement officers and on my experience and training as a special agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included all facts known to me concerning this

investigation. I have instead set forth only the facts that I believe are necessary to establish probable cause to believe that Adsit has violated 18 U.S.C. § 2252A(a)(2) (receipt and distribution of child pornography).

### **PROBABLE CAUSE**

#### **Hard4litte Kik Account**

4. On February 19, 2020, the National Center for Missing and Exploited Children (“NCMEC”) received CyberTipline Report XXXX2770 (“CyberTip-1”) from Kik Messenger. CyberTip-1 details that, on February 4, 2020, approximately 24 image and video files of child pornography were uploaded to Kik account “hard4litte” created by email address XXXXX@yandex.com, with a user-inputted name of “Ran XXXX.”

5. The images and videos were provided to NCMEC by Kik, and then to your affiant by NCMEC. Several of the media files were duplicates, and, as a result, eight unique media files were identified. All of the files are available for the Court’s inspection upon request. Two of them are described as follows:

- a. Video 1 (“6325d9c4-9aa6-4cb4-a525-a481879fe2d5.mp4”) – approximately two minutes in length, depicts a young girl, approximately six years of age, fully nude, being anally raped by an adult male.
- b. Video 2 (“16241a84-b4b5-4215-801d-6d2e90b49d3d.mp4”) – approximately one minute in length, depicts a different young girl, approximately six years of age, fully nude being vaginally raped by a partially clothed adult male.

6. Based on CyberTip-1, law enforcement officials conducted additional investigation and learned that telephone number 315-XXX-2433 was assigned to relevant IP addresses

associated with the activity, and subsequent subpoena returns identified the following subscriber information for that telephone number:

Activation Date: 09/22/2018  
Deactivation Date: 03/17/2020<sup>1</sup>  
City, State, Zip: Lowville, NY, 13367  
Account ID: XXXXXX@gmail.com  
Date of Birth: XX/XX/1970  
Phone: 315-XXX-0156

7. Additional information received from Kik pertaining to the email address XXXXXX@yandex.com and hard4litte reflected the following:

a. Kik Information:

First Name: Ran  
Last Name: XXXXX  
Email: XXXXXX@yandex.com  
Username: hard4litte  
Login IP addresses: Kik provided IP logs for user hard4litte

**Funtime4me4 Kik Account**

8. A detective from the Winnebago County Sheriff's Office, acting as an FBI Online Covert Employee ("OCE") had contact with the user funtime4me4 within Kik Group "A." The group name is protected for purposes of an ongoing investigation. Kik Group "A" has been established as a child sexual abuse material sharing group on Kik Messenger. While both OCE and funtime4me4 were members of the group, multiple images and videos of child pornography were sent to all members of the group. User funtime4me4 also distributed child pornography in this group. The images and videos distributed by funtime4me4 as observed by the OCE were

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<sup>1</sup> The service period, 09/22/2018 to 03/17/2020 is consistent with the timeframe for CyberTip-1.

provided to your affiant by FBI Milwaukee. The files are available or the Court's inspection upon request. Two of them are described as follows:

- a. Video 1 ("IMG\_5020.mp4") – approximately 20 seconds in length, depicts a young girl, approximately four years of age, fully nude laying on a bed, being anally digitally penetrated by an adult male.
- b. Image 1 ("IMG\_5038.jpg") – depicts a different young girl, approximately three years of age, wearing a pink t-shirt, baseball hat, and winter boots, fully nude from the waist down, legs spread and vagina exposed.

9. On May 15, 2020, law enforcement officials served an administrative subpoena on Kik for subscriber information associated to funtime4me4. On June 10, 2020, Kik provided the following information:

First Name: Dam  
Last Name: XXXXXX  
Email: XXXXX@tutanota.com (confirmed)  
Username: funtime4me4  
IP logs: Mobile connections occurred from IP addresses

10. Law enforcement officials in Milwaukee followed a nearly identical process as described above for identifying the subscriber for the IP addresses. The subpoena process culminated in receiving the subscriber information detailed above.

11. On September 18, 2020, NCMEC received CyberTipline Report XXXX6962 ("CyberTip-2") from Kik Messenger. CyberTip-2 details that, on various dates in September 2020, approximately 46 image and video files of child pornography were uploaded to Kik account funtime4me4. CyberTip-2 reflects that, for each file, Kik viewed the entire contents of the file and

that the file was either shared in a messaging group or was sent by the user to another user in a private chat.

12. Open source checks were conducted on Adsit's personal identifiers in several law enforcement databases. Results revealed that Adsit is a level-1 sex offender. In February 2008, Adsit pled guilty in Lewis County Court to one count of possessing a sexual performance by a child less than 16 years of age, and he was sentenced to 433 days' imprisonment.

13. On November 11, 2020, your affiant and other law enforcement executed a search warrant at Adsit's residence. Among other evidence, law enforcement recovered several electronic devices. A preview of one of the devices showed that the Kik application was loaded with the funtime4me4 username. Within the Kik application, law enforcement saw that the funtime4me4 user was a member of more than one group in which child exploitation material was being traded. Among the child exploitation material sent by funtime4me4 to one of the groups in which he was a member appears to be a video of an adult male having vaginal or anal sex with an approximately eight to 10-year-old female accompanied by messaging that said: "A good way to wake her up" followed by two emojis (thinking and winking).<sup>2</sup> Among the child exploitation material sent by other members of one of the groups in which funtime4me4 was a member is a video of a

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<sup>2</sup> Law enforcement was able to view the initial screen shot of this video but not the video itself because the device was placed in airplane mode as part of the forensic extraction process.

prepubescent female who is blind folded with her hands tied above her head laying on a towel, fully nude with her legs spread, and a dog is licking her vagina.<sup>3</sup>

14. Adsit also admitted during a *Mirandized* and audio and partly video recorded interview that he was involved with online groups that traded child pornography over the internet, including Kik. Adsit also acknowledged receiving one image of child pornography that was sent to him as part of his participation in one of the above-described groups on Kik and admitted that he might have forwarded that image on to others. Adsit said that he recalled the display name ("Ran XXXX") for the hard4litte Kik account as being his display name, but he claimed not to recall other Kik usernames or display names that he used. He admitted that the email address associated with the funtime4me4 Kik account was his email address. He also volunteered his telephone number as the same telephone number associated with accessing both Kik accounts described above.

15. In addition, Adsit signed a written statement that states, in part, "I would like to state in no uncertain terms that, where child pornography is concerned, all I ever did was trade it with other people who already had it, because I needed more and more disgusting child porn to look at to make the pain go away and I had to send child pornography to other people to get them to send their child pornography to me."

### CONCLUSION

16. Based upon the above information, there is probable cause to establish that Adsit violated 18 U.S.C. § 2252A(a)(2)(B) (receipt and distribution of material containing child

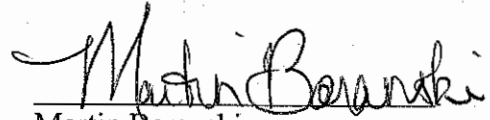
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<sup>3</sup> Law enforcement was able to view the initial screen shot of this video but not the video itself because the device was placed in airplane mode as part of the forensic extraction process.



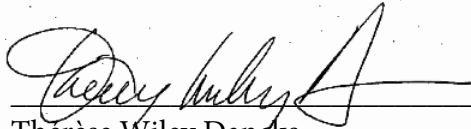
pornography), and I request that a criminal complaint and arrest warrant be issued pursuant to these violations of federal law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.



Martin Baranski  
Special Agent  
Federal Bureau of Investigation

I, the Honorable Hon. Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on November 11, 2020, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Thérèse Wiley Dancks  
United States Magistrate Judge